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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of

Amendment of the Amateur)
Service Rules to Implement)
a Vanity Call Sign System)

PR Docket No. 93-305

To: The Commission

COMMENTS OF FREDERICK O. MAIA, W5YI

INTRODUCTION

Frederick O. Maia files these comments in support of the Commission's proposal to implement a program which would permit amateur radio operators to select specific combinations of prefix and suffix amateur radio station call sign letters, that is, vanity call signs.

COMMENTS ON THE FCC PROPOSAL

We believe the vanity call sign system as outlined in PR Docket No. 93-305 will be extremely popular within the amateur community.

We feel certain, however, that the Commission will be inundated with a multitude of requests for vanity call signs. Our own experience in conducting an amateur radio license renewal service and amateur and commercial radio license examinations on a national basis is that most applicants need information and guidance in the proper procedures to be

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followed to obtain a license, despite the regulations and instructions published by the FCC.

In short, the low \$70 vanity call sign cost may not be adequate enough to cover the FCC's increased administrative burden especially if the Commission must respond to endless inquiries, telephone calls and correspondence concerning call sign availability, proper filing procedures, application handling and call sign issuance.

While the rules may be clearly published, we believe that many applicants will need assistance in obtaining their vanity call sign. Furthermore, a station call sign is so important to an amateur radio operator that we believe most would prefer personal guidance through the process to insure proper and expeditious handling of their request.

Each of our three divisions is deeply involved in the processing of radio operator license applications. We feel that advance screening of applications is very important to all concerned - especially the Commission who receive a product which they can quickly process at minimum expense.

In calendar year 1993, 4,067 amateur test sessions (more than one-third of the total) were conducted by W5YI accredited volunteer examiners. The W5YI-VEC issues application completion instructions and screens the FCC Form 610 of every

examinee tested for a new or upgraded operator license. Many must be returned to the applicants or examiners for correction before submission to the Commission's Gettysburg, Pennsylvania, licensing facility. The screening of applications by VEC's has dramatically reduced the overall "defective applications rate" to two-tenths of one percent¹ (.2%) - the lowest of any radio service. And this percentage has been lower than the previous year for three years in a row.

It thus appears desirable that the Commission incorporate or otherwise allow some sort of assistance and screening service for the vanity call sign system. In paragraph 5 of the Notice, the Commission requested comment on "...other means ...that applicants could use to apply directly to the Commission for a vanity call sign." In paragraph 6, the FCC requests comments on how licensees requesting vanity call signs might "...make prudent selections of call signs with a real possibility that their requests can be granted." We believe that this can only be accomplished through a mechanism that works directly with applicants, well before their application forms reach the FCC for processing.

Thus we believe that private entities could and should be allowed to provide a vanity call sign filing service for an additional fee paid by the applicant. This service, which might be formally or informally referred to as a Vanity Call

¹ 1993 VEC Statistics, Year-to-Date Defective Applications

Sign Administrator, could provide the following:

- (1.) Have the capability to advise applicants in real time of the availability of call signs in the vanity call sign system.

This would require access to the FCC's amateur radio operator data base. The on-line information available would be similar to that provided to the Consumer Assistance Branch personnel in Gettysburg. The additional costs incurred in routing the on-line information to the service would be paid by the vanity call sign filing service.

- (2.) Providing instructions, forms and guidance and handling inquiries on the proper application and filing for a vanity call sign.
- (3.) Expeditious filing of the FCC Form 610-V application and fee to the appropriate FCC address.
- (4.) Maintaining records and responding to inquiries from applicants who have applied for vanity call signs.

Paragraph 5 of the Notice indicated that vanity call signs selected must be within the framework of the current

group call sign system.² We strongly believe that many applicants will need assistance in obtaining this information. Very few amateurs have knowledge of the intricate nature of 1978 Call Sign Assignment System which established the amateur service call sign groups.³

Private organizations who are known and trusted by the Commission should be permitted real time, read-only access to the FCC's data base which indicates amateur call signs that have been issued. This would permit vanity call sign applicants to quickly ascertain the availability of desired call signs by contacting these private entities. From a data security standpoint, it does not appear advisable that the

² The new proposed Rules did not mention the requirement that vanity call signs must be within the framework of the sequential call sign assignment system wherein certain groups of call signs are designated for each class of operator license. We assume that this requirement will be contained in the Public Announcement mentioned in §97.19(f)(4) which will specify vanity call sign system procedures.

³ The 1978 Amateur Station Call Sign Assignment System is very complex. For example, certain station call sign prefixes are reserved for use in the Pacific, Alaska and Atlantic (Caribbean) areas. There are other little known excluded call sign blocks which are allocated to certain geographical areas - such as U.S. amateur stations in Antarctica.

Part 2.302 (47 CFR §2.302) also excludes certain amateur station 1 and 2-letter prefix call signs where the letter "X" follows the digit. These call signs are issued only to experimental radio stations. Certain blocks (for example: W, K and N by-1 letter and AA-AL and NA-NZ prefixed 2-by-3 format) were never part of the Amateur Station Group Call Sign Assignment System but are allocated under Part §2.302 to U.S. amateur stations. So called "Group X" (WC, WK, WM, WR and WT by-3 letter call signs) were set aside for RACES, Club, Military Recreation, Repeaters and Temporary licenses - but never implemented. Certain 3-letter suffixes (such as those which are also "Q" signals) have been historically excluded from assignment. It thus appears certain that applicants for vanity call signs will need assistance in clarifying the availability of various prefix, suffix, group and individual call signs.

general public should be allowed unrestricted access to the FCC's data processing system.

If the W5YI Group had access to this computerized information, a side benefit would be that we would be able to better respond to inquiries from examinees inquiring about the status of their new or upgraded amateur operator license. We get hundreds of licensing inquiries from amateurs that we must routinely refer to the FCC's Consumer Assistance Branch at Gettysburg since we do not have access to the needed information. This requires additional time and telephone expense to the applicant and increases the administrative load to the FCC staff. We believe we could greatly reduce the number of telephone calls from amateurs received at Gettysburg if we were permitted access to the FCC's amateur operator data base.

Between our Amateur Radio Operator license renewal service and W5YI-VEC operation, the W5YI Group submits dozens ...and sometimes hundreds of Amateur Radio Operator license applications to the FCC every week. While there are 18 VEC organizations, only two VEC's handle the majority (nearly 85%) of all applicants seeking new and upgraded Amateur Radio Operator licenses. The W5YI-VEC is one of those two organizations. Thus the W5YI Group is a logical choice to assist the amateur community and the Commission with the vanity call sign assignment system. We would not oppose a requirement

that we provide service to other VECs or Vanity Call Sign Administrators.

The FCC will shortly be inaugurating a new automated processing system which will permit electronic filing of FCC Form 610 applications. The W5YI-VEC will be participating in this program which will greatly improve service to the public. In paragraph 7 of the Notice, the Commission mentions that "Our goal is to accept eventually applications for licenses or call signs electronically" and may issue amateur licenses electronically in the future.

An extension of electronic filing could make vanity call sign issuance more efficient and the W5YI Group, with all needed components already in place, could easily provide electronic filing of vanity call sign applications as well as regular Form 610s. Applicants who have paid the appropriate vanity call sign fee would simply have their vanity call sign selections transmitted directly to the FCC in Gettysburg in much the same manner as regular FCC Form 610's.

The Commission did not suggest any sort of transition program for various groups or classes of licensees wishing to obtain priority in obtaining vanity call signs. The rules suggested by the Commission are on a first-come first-serve basis. Whoever makes the initial request for a specific vanity call sign would normally obtain the selected call

sign. Some amateurs believe that previous holders of call signs should be granted priority in reclaiming them.

We also are aware that some amateur radio clubs wish to obtain a memorial call sign of a deceased member; a son wishes to reclaim his father's call sign; specific letters reflecting an amateur's initials are frequently desired; stations active in public service networks wish a call letters symbolizing their organization or activity, long term amateurs or those holding a senior level licenses believe they should be granted precedence over requests by licensees of less stature - and on and on.

It is not possible for the Commission to phase in a vanity call sign system in stages which will please all people. Thus, the first-come first-served plan for the assignment of vanity call signs appears appropriate. The reality is that those who most wish a specific call sign letter combination the most - are certain to apply the quickest. It is up to the applicant for a vanity call sign to seek out an assistance service which will serve them the best.

Our discussion has been responsive to the Commission's desire to provide a way for applicants to pick ten call signs that have a reasonable chance of being granted. However, we suggest that the Commission consider a program whereby

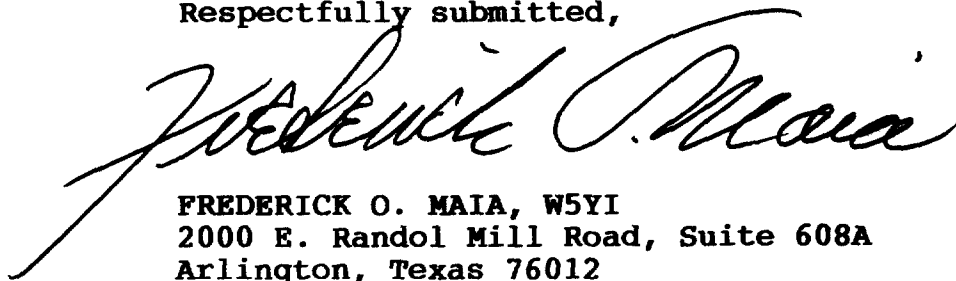
designated Vanity Call Sign Administrators could actually reserve a call sign in real time, thereby reducing the Commission's processing function by eliminating the need to evaluate ten possible choices.

CONCLUSION

We believe that the Commission's intention to provide specific user-selected call signs fulfills a need long desired in the Amateur Service. The vanity call sign system should be implemented as soon as possible.

For a personalized amateur station call sign program to work effectively and efficiently with the Commission, we believe it important that Vanity Call Sign Administrators be permitted or appointed to assist the amateur community. The most efficient vanity call sign services will be those who have access to and can disperse up-to-date call sign information. A service charge could be imposed on amateurs being assisted in the selection of a specific call sign.

Respectfully submitted,



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